

JENNER & BLOCK LLP

Reid J. Schar (*pro hac vice*)

RSchar@jenner.com

353 N. Clark Street

Chicago, IL 60654-3456

Telephone: +1 312 222 9350

Facsimile: +1 312 527 0484

CLARENCE DYER & COHEN LLP

Kate Dyer (Bar No. 171891)

kdyer@clarencedyer.com

899 Ellis Street

San Francisco, CA 94109-7807

Telephone: +1 415 749 1800

Facsimile: +1 415 749 1694

CRAVATH, SWAINE & MOORE LLP

Kevin J. Orsini (*pro hac vice*)

korsini@cravath.com

825 Eighth Avenue

New York, NY 10019

Telephone: +1 212 474 1000

Facsimile: +1 212 474 3700

Attorneys for Defendant PACIFIC GAS AND ELECTRIC
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**ADMINISTRATIVE MOTION OF
PACIFIC GAS AND ELECTRIC
COMPANY TO FILE UNDER SEAL
PORTIONS OF RESPONSE TO
REQUEST FOR FURTHER
RESPONSES**

Judge: Hon. William Alsup

1 Pursuant to Criminal Local Rule 56-1, Pacific Gas and Electric Company
2 (“PG&E”) respectfully submits this Administrative Motion to File Under Seal (the
3 “Administrative Motion”).

4 PG&E makes the following statement in support of its Administrative Motion:

5 1. Counsel for PG&E has reviewed and complied with Civil Local Rule 79-5 and
6 Criminal Local Rule 56-1, which require that if a document or portion thereof is sealable,
7 counsel seeking to file the document or portion of the document under seal must file and serve an
8 administrative motion for a sealing order, accompanied by a declaration establishing that the
9 materials are sealable.

10 2. PG&E seeks to file under seal redacted portions of Exhibits 1, 2 and 3 to the
11 Declaration of Kate Dyer in Support of PG&E’s Administrative Motion to File Under Seal (the
12 “Dyer Declaration”), which correspond to Exhibits A, B and C to PG&E’s Response to Request
13 for Further Responses, respectively. Specifically, PG&E seeks to redact for safety reasons the
14 names of the PG&E employees and contractors identified in these documents. PG&E further
15 seeks to redact the names, addresses and contact information of PG&E customers in these
16 documents.

17 3. Criminal Local Rule 56-1 provides that a sealing order may issue where
18 information, if made available to the public, would compromise the safety of a person. *See*
19 Criminal Local Rule 56-1(b) and Commentary.

20 4. PG&E believes that the safety of the PG&E employees, contractors and their
21 family members could be compromised if their names are made publicly available as part of the
22 PG&E Response.

23 5. As set forth in the Dyer Declaration, PG&E has observed a dramatic increase
24 in the number of workplace violence events from customers towards employees and contractors,
25 including during PSPS events. In addition, PG&E executives who have spoken publicly on
26 behalf of PG&E with respect to its wildfire mitigation efforts have received death threats.

1 Dated: February 12, 2021

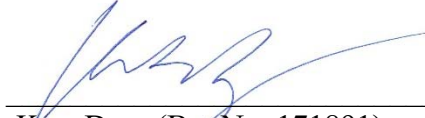
Respectfully Submitted,

2 JENNER & BLOCK LLP
3 Reid J. Schar (*pro hac vice*)

4 CRAVATH, SWAINE & MOORE LLP
5 Kevin J. Orsini (*pro hac vice*)

6 CLARENCE DYER & COHEN LLP

7
8 By:


9 Kate Dyer (Bar No. 171891)
10 Attorneys for Defendant PACIFIC GAS
11 AND ELECTRIC COMPANY
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